

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 2020-229-E**

In the Matter of:

Dominion Energy South Carolina,  
 Incorporated's Establishment of a  
 Solar Choice Metering Tariff Pursuant  
 to S.C. Code Ann. Section 58-40-20

**PETITION TO INTERVENE OUT OF  
 TIME**

The South Carolina Coastal Conservation League ("CCL"), Southern Alliance for Clean Energy ("SACE"), and Upstate Forever (collectively, "Petitioners"), through counsel, hereby petition the Public Service Commission of South Carolina ("Commission"), pursuant to R. 103-825 of the Commission's rules, to intervene out of time in the above-captioned docket. In support of this petition, Petitioners state as follows:

1. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is 131 Spring Street, Charleston, South Carolina, 29403. As an advocate for conservation and energy efficiency, CCL supports development of energy policy that is in the public interest of South Carolinians.
2. SACE is a regional nonprofit organization whose mission is to promote responsible energy choices that address global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE has its principal office in Tennessee, with a mailing address of Post Office Box 1842, Knoxville, Tennessee,

37901. SACE also has offices in North Carolina, South Carolina, Georgia, and Florida.

3. Upstate Forever is a non-profit, membership-based organization existing under the laws of the State of South Carolina. Upstate Forever promotes sensible growth and the protection of the critical lands, waters, and unique character of Upstate South Carolina. The principal address of Upstate Forever is 507 Pettigru Street, Greenville, South Carolina, 29601.
4. Petitioners intervened in Docket No. 2019-182-E, the generic net metering docket underway, and were active participants in the procedural discussions and stakeholder technical workshops held on March 12, 2020 and April 23, 2020.
5. Petitioners and their members have a direct and substantial interest in this proceeding. Petitioners each have members who are customers of Dominion Energy South Carolina (“DESC”) and are therefore subject to the direct impacts of utility net metering tariffs and the net metering policies established by the Commission in this docket. Petitioners and their members are interested in promoting greater reliance on distributed renewable resources to meet South Carolina’s energy needs.
6. Petitioners recognize that the Commission directed parties to file a Petition to Intervene on or before November 9, 2020. Petitioners consented to the proposed procedural schedule filed by DESC in Docket No. 2019-182-E and approved by the Commission in Order No. 2020-622; however, that proposed schedule did not include a deadline to intervene, and due in part to several recent staffing and administrative changes, counsel for Petitioners inadvertently missed the

subsequent Commission order setting the intervention deadline in this proceeding. Petitioners therefore respectfully request that the Commission grant this petition to intervene out of time. Because the proceeding is at an early stage and no testimony has yet been filed, Petitioners' intervention will not delay this proceeding or prejudice existing parties. No other party to this proceeding will adequately represent Petitioners' unique interests in this proceeding.

7. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that it be allowed to intervene in this docket.

Respectfully submitted this 1st day of December, 2020.

s/ Katherine N. Lee  
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Clean Energy, and Upstate Forever*

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In the Matter of: )

Dominion Energy South Carolina, )

Incorporated's Establishment of a Solar )

Choice Metering Tariff Pursuant to S.C. )

Code Ann. Section 58-40-20 )

CERTIFICATE OF SERVICE

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I certify that the following persons have been served with one (1) copy of the Petition to Intervene Out of Time by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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December 1, 2020

/s/ Emily E. Selden